

Lexi J. Hazam (SBN 224457)  
[lhazam@lchb.com](mailto:lhazam@lchb.com)  
LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: (415) 956-1000

Previn Warren (*pro hac vice*)  
[pwarren@motleyrice.com](mailto:pwarren@motleyrice.com)  
MOTLEY RICE LLC  
401 9th Street NW, Suite 630  
Washington, DC 20004  
Telephone: (202) 386-9610

*Plaintiffs' Co-Lead Counsel*

Jennie Lee Anderson (SBN 203586)  
[jennie@andrusanderson.com](mailto:jennie@andrusanderson.com)  
ANDRUS ANDERSON LLP  
155 Montgomery Street, Suite 900  
San Francisco, CA 94104  
Telephone: (415) 986-1400

*Plaintiffs' Liaison Counsel*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*H.F. and C.A., v. Meta, et al.*, 4:24-cv-  
08885;

*SB and JC, v. Meta, et al.*, 4:24-cv-09400;

*RN and AR, v. Meta, et al.*, 4:24-cv-09406;

*AG and MT, v. Meta, et al.*, 4:24-cv-09354;

*T.S. ind. & obo E.S., v. ByteDance, Ltd, et  
al.*, 4:25-cv-00060;

*L.G. ind. & obo E.B., v. ByteDance, Ltd, et  
al.*, 4:25-cv-00100;

*D.M. and M.A., v. Meta, et al.*, 4:25-cv-  
00118;

*L.G. ind. & obo K.B., v. ByteDance, Ltd, et  
al.*, 4:25-cv-00122;

*E.W. and K.W., v. Meta, et al.*, 4:25-cv-  
00161;

*M.S. and S.K., v. Meta, et al.*, 4:25-cv-00169;

**DECLARATION OF JENNIE LEE  
ANDERSON IN SUPPORT OF PLAINTIFFS'  
THIRTEENTH CONSOLIDATED *EX PARTE*  
APPLICATION FOR APPOINTMENT OF  
GUARDIANS *AD LITEM***

1 *M.C. ind. & obo A.N., v. Meta, et al.*, 4:25-  
cv-00270;

2 *B.R. and L.R., v. Meta, et al.*, 4:25-cv-00282;

3 *A.B. by and through her Guardian Ad Litem*  
4 *Robert Budreau v. Meta, et al.*, 4:25-cv-  
01269;

5 *J. C., by and through his Guardian Ad Litem,*  
6 *Kenyatta Leflore v. Meta, et al.*, 4:25-cv-  
02399;

7 *K.H., by and through April Howell v. Snap*  
8 *Inc et. al*, 4:25-cv-02985.

9 I, Jennie Lee Anderson, do hereby declare and state as follows:

10 1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted  
11 to practice before the courts of the State of California and in the Northern District of California. I  
12 am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent*  
13 *Addiction/Personal Injury Products Litigation*, Case No. 4:22-MD-03047, and a counsel of  
14 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I  
15 make this declaration of my own personal knowledge and, if called as a witness, I could and  
16 would testify competently to the matters stated below.

17 2. I make this declaration in support of Plaintiffs' Thirteenth Consolidated *Ex*  
18 *Parte* Application for Appointment of Guardians *Ad Litem*.

19 3. Attached hereto as ***Exhibit 1*** is a true and correct copy of the *Ex Parte*  
20 Application for Appointment of Guardian *Ad Litem* I received for the case *H.F. and C.A. v. Meta,*  
21 *et al.*, 4:24-cv-08885.

22 4. Attached hereto as ***Exhibit 2*** is a true and correct copy of the *Ex Parte*  
23 Application for Appointment of Guardian *Ad Litem* I received for the case *SB and JC v. Meta, et*  
24 *al.*, 4:24-cv-09400.

25 5. Attached hereto as ***Exhibit 3*** is a true and correct copy of the *Ex Parte*  
26 Application for Appointment of Guardian *Ad Litem* I received for the case *RN and AR v. Meta, et*  
27 *al.*, 4:24-cv-09406.  
28

6. Attached hereto as **Exhibit 4** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *AG and MT v. Meta, et al.*, 4:24-cv-09354.

7. Attached hereto as **Exhibit 5** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *T.S. ind. & obo E.S. v. ByteDance, Ltd, et al.*, 4:25-cv-00060.

8. Attached hereto as **Exhibit 6** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *L.G. ind. & obo E.B. v. ByteDance, Ltd, et al.*, 4:25-cv-00100.

9. Attached hereto as **Exhibit 7** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *D.M. and M.A. v. Meta, et al.*, 4:25-cv-00118.

10. Attached hereto as **Exhibit 8** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *L.G. ind. & obo K.B. v. ByteDance, Ltd, et al.*, 4:25-cv-00122.

11. Attached hereto as **Exhibit 9** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *E.W. and K.W. v. Meta, et al.*, 4:25-cv-00161.

12. Attached hereto as **Exhibit 10** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *M.S. and S.K. v. Meta, et al.*, 4:25-cv-00169.

13. Attached hereto as **Exhibit 11** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *M.C. ind. & obo A.N. v. Meta, et al.*, 4:25-cv-00270.

14. Attached hereto as **Exhibit 12** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *B.R. and L.R. v. Meta, et al.*, 4:25-cv-00282.

15. Attached hereto as **Exhibit 13** is a true and correct copy of the *Ex Parte*

1 Application for Appointment of Guardian *Ad Litem* I received for the case *A.B. by and through*  
 2 *her Guardian Ad Litem Robert Budreau v. Meta, et al.*, 4:25-cv-01269.

3 16. Attached hereto as **Exhibit 14** is a true and correct copy of the *Ex Parte*  
 4 Application for Appointment of Guardian *Ad Litem* I received for the case *J. C., by and through*  
 5 *his Guardian Ad Litem, Kenyatta Leflore v. Meta, et al.* 4:25-cv-02399.

6 17. Attached hereto as **Exhibit 15** is a true and correct copy of the *Ex Parte*  
 7 Application for Appointment of Guardian *Ad Litem* I received for the case *K.H., by and through*  
 8 *April Howell v. Snap Inc et al.*, 4:25-cv-02985.

9 18. **Exhibits 1-15** are Applications submitted to Plaintiffs' Liaison Counsel for  
 10 filing since the last guardian *ad litem* submission. I have reviewed the *Ex Parte* Applications  
 11 attached as **Exhibits 1-15**. The Applications have been made by the minor's parent, and/or legal  
 12 guardian. Further, the *Ex Parte* Applications are consistent with *Attachment A* to this Court's  
 13 Order Regarding Appointment of Guardian *Ad Litem* (ECF No. 122), and include (1) the  
 14 applicant's name and contact information (including address, email, and telephone number); (2)  
 15 the name, case number, state of domicile (and its minimum age of capacity); (3) a statement that  
 16 the applicant is the parent and/or legal guardian of the minor plaintiff; and (4) a statement  
 17 affirming that the applicant is fully competent and qualified to understand and protect the rights  
 18 of the minor plaintiff and has no interests adverse to the interests of that person.

19 I declare under penalty of perjury pursuant to the laws of the United States of America that  
 20 the foregoing is true and correct.

21 Dated: April 4, 2025

Respectfully submitted,

22  
 23 /s/Jennie Lee Anderson  
 Jennie Lee Anderson

24 ANDRUS ANDERSON LLP  
 25 155 Montgomery Street, Suite 900  
 26 San Francisco, CA 94104  
 27 Telephone: (415) 986-1400  
 Facsimile: (415) 986-1474  
[jennie@andrusanderson.com](mailto:jennie@andrusanderson.com)

28 *Plaintiffs' Liaison Counsel*